

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JAMES DAVIS, Plaintiff	:	
v.	:	Criminal No. 15-CR-138
	:	Civil No. 22-CV-04158
UNITED STATES OF AMERICA,	:	
Respondent		

**GOVERNMENT’S MOTION FOR EXTENSION OF
TIME TO FILE ANSWER**

The United States, by and through undersigned counsel, respectfully moves for an extension of time to file its response to the Petitioner’s Motion under 18 U.S.C. § 2255. On October 17, 2022, Petitioner James Davis filed his Motion to Vacate, Set Aside, or Correct a Sentence By a Person in Federal Custody. Dkt. No. 304. On February 24, 2023, this Court ordered the Government to respond by March 27, 2023. Dkt. No. 305.

After reviewing the Petitioner’s motion, the government expects that it will need additional time to conduct legal research and do a thorough review of the trial record in order to prepare appropriate responses to the Petitioner’s arguments. An extension would also allow time to obtain any affidavits needed from trial and appellate counsel and would provide the government an opportunity to review them.

Wherefore, for the reasons discussed herein, the government respectfully requests that this motion be granted and the deadline for the government's responses be rescheduled to April 27, 2023.

Respectfully submitted,

JACQUELINE C. ROMERO
UNITED STATES ATTORNEY

By: /s/ Sarah L. Grieb
Sarah L. Grieb
Christopher Diviny
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COREY R. AMUNDSON
CHIEF, PUBLIC INTEGRITY SECTION
U.S. DEPARTMENT OF JUSTICE

By: /s/ Jennifer A. Clarke
Jennifer A. Clarke
Deputy Chief
Public Integrity Section

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed and also was mailed to the defendant at the address below on March 23, 2023.

James Davis, pro se
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/s/Sarah L. Grieb
Sarah L. Grieb
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